

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TENNESSEE

IN RE: Harry Cameron Clark, Sr.,
Iris Melissa Clark

#18-30365-SHB
Chapter 13

OBJECTING PARTY: **CHAPTER 13 TRUSTEE OBJECTION TO CONFIRMATION**

- ☐ 1. Debtor(s) not eligible for chapter 13 relief. 11 U.S.C. § 109
- ☐ 2. Plan not proposed in good faith. 11 U.S.C. § 1325(a)(3)
- ☒ 3. Creditors receive less under the plan than they would receive in a chapter 7.
11 U.S.C. § 1325(a)(4)
- ☐ 4. Plan does not provide for payment of all disposable income. 11 U.S.C. § 1325(b)
- ☒ 5. The plan is not feasible. 11 U.S.C. § 1325(a)(6)
- ☐ 6. Petition not filed in good faith. 11 U.S.C. § 1325 (a)(7)
- ☐ 7. Debtor(s) has failed to pay required domestic support obligations post-petition.
11 U.S.C. § 1325 (a)(8)
- ☐ 8. Unsecured claims are improperly classified or plan unfairly discriminates as a class.
11 U.S.C. § 1322(b)(1)
- ☐ 9. Plan improperly provides for lien avoidance.
- ☐ 10. Collateral is undervalued or all collateral not listed. 11 U.S.C. § 1325(a)(5)(B)
- ☐ 11. No interest provided on claim or interest rate is insufficient. 11 U.S.C. § 1325(a)(5)(B)
- ☐ 12. Lack of adequate protection, either in monthly payment on secured debt or absence of insurance. 11 U.S.C. § 1325(a)(5)(B)
- ☐ 13. The plan does not permit a deficiency claim.
- ☐ 14. Security interest in principal residence is impermissibly modified, no mortgage arrearage listed, or mortgage default is not cured within a reasonable time. 11 U.S.C. § 1322(b)(2)
- ☐ 15. Plan does not provide for lien retention for a secured claim. 11 U.S.C. § 1325(a)(5)(B)
- ☒ 16. Debtor(s) have not filed federal income tax return for 2017. 11 U.S.C. § 1325 (a)(9).
- ☐ 17. Debtor(s) have failed to provide Trustee with copies of federal income tax returns.
- ☒ 18. Trustee preserves any and all other applicable objections to confirmation.
- ☐ 19. Other : _____

By signing this objection, I certify that I have given oral notice of this objection to the debtor(s) and their attorney at the meeting of creditors:

/s/ Gwendolyn M. Kerney
Gwendolyn M. Kerney, #07280
Chapter 13 Trustee
PO Box 228
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(865) 524-4995